

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

VIRTAMOVE, CORP., Plaintiff,	§	
	§	Case No. 2:24-cv-00093-JRG
	§	(Lead Case)
v.	§	
	§	
HEWLETT PACKARD ENTERPRISE COMPANY,	§	<b>JURY TRIAL DEMANDED</b>
Defendant.	§	
	§	
	§	
	§	
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VIRTAMOVE, CORP., Plaintiff,	§	
	§	Case No. 2:24-CV-00064-JRG
	§	(Member Case)
v.	§	
	§	
INTERNATIONAL BUSINESS MACHINES CORP.,	§	<b>JURY TRIAL DEMANDED</b>
Defendant.	§	
	§	
	§	

**UNOPPOSED MOTION FOR EXTENSION AND TO AMEND DOCKET CONTROL  
ORDER**

Plaintiff VirtaMove Corp. (“VirtaMove”) respectfully moves the Court extend the fact-discovery deadline by two weeks in the above captioned-cases for VirtaMove, Hewlett Packard Enterprise Company (“HPE”), and International Buisness Machines Corp. (“IBM”) (collectively, the “Parties”). Specifically, the Parties ask that the deadline to complete fact discovery and file motions to compel discovery be extended from May 15, 2025 to May 29, 2025, with all following deadlines modestly shifted pursuant to the attached Exhibit. This request is unopposed.

Good cause exists for this extension. VirtaMove has identified certain outstanding discovery deficiencies, including related to HPE and IBM’s production of technical documents and source code that bear directly on infringement issues. The VirtaMove has diligently

corresponded with the Parties, and requires additional time to resolve its outstanding issues. Additionally, given that certain counsel for VirtaMove are in trial this week in *Headwater v. Samsung*, No. 2:23-cv-00103 (E.D. Tex.), that has limited their availability to resolve outstanding issues and has imposed constraints on the scheduling of depositions. This Motion is not made for purposes of delay, will not prejudice any party, and, if granted, will not interfere with any other deadline in this case. There have been no other extension requests related to the deadlines contemplated herein.

For these reasons, the VirtaMove submit that good cause exists to extend the aforementioned deadlines in this matter and respectfully request that the Court grant this Unopposed Motion accordingly.

Dated: April 23, 2025

Respectfully submitted,

By: /s/ Reza Mirzaie

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*Attorneys for Plaintiff VirtaMove, Corp.*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system pursuant to Local Rule CV-5(a)(3) on April 23, 2025.

/s/ Daniel B. Kolko  
Daniel B. Kolko

**CERTIFICATE OF CONFERENCE**

The undersigned hereby certifies that counsel has complied with the meet and confer requirement in Local Rule CV-7(h) and that this is a joint motion.

/s/ Daniel B. Kolko  
Daniel B. Kolko